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May 12, 1997

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VIA HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: MM Docket No. 97-97; RM-9047


Dear Mr. Caton:

Transmitted herewith, on behalf of Mt. Juliet Broadcasting, Inc., ("MJB") are an original and four copies of MJB's Comments with regard to the Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations, in the above-referenced docket.

If any questions should arise in the course of your consideration of this matter, please communicate with the undersigned.

Very truly yours,

HOLLAND & KNIGHT

By: 
Julie Chung Kim
Counsel for Mt. Juliet Broadcasting,
Inc.

Enclosures

cc: Michael Grant
David Honig, Esq.

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Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED
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In the Matter of

Amendment of Section 73.202(b)
Table of FM Allotments
(Mt. Juliet and Belle Meade,
Tennessee)

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)
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MM Docket No. 97-97
RM No. 9047

To: Chief, Allocations Branch

COMMENTS OF
MT. JULIET BROADCASTING, INC.

1. Mt. Juliet Broadcasting, Inc. ("WNPL"), permittee of FM station WNPL, Mt. Juliet, Tennessee, by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submits its comments in support of the Commission's proposal to amend the FM Table of Allotments by reallocating Channel 294A (106.7 MHz) from Mt. Juliet, Tennessee to Belle Meade, Tennessee and to modify Station WNPL's construction permit accordingly. *See Notice of Proposed Rulemaking*, DA 97-541, released March 21, 1997 ("NPRM").

2. WNPL supports the deletion of Channel 294A at Mt. Juliet, Tennessee and the reallocation of Channel 294A to Belle Meade, Tennessee and requests that the Commission modify its authorization accordingly. If WNPL is allotted Channel 294A at Belle Meade, Tennessee, it will timely construct an FM station to serve that community and provide that community with its first local aural transmission service.

3. WNPL proposes to amend the FM Table of Allotments (47 C.F.R. § 73.202(b))

as follows:

<u>Community</u>	<u>Present Allotment</u>	<u>Proposed Allotment</u>
Mt. Juliet	294A	None
Belle Meade	None	294A

4. In addition to this amendment of the FM Table of Allotments, WNPL requests that the Commission modify its construction permit to specify operation on Channel 294A at Belle Meade, Tennessee, in accordance with Section 1.420(i) of the FCC's Rules, 47 C.F.R. § 1.420(i).¹ The Commission may modify WNPL's authorization without considering competing expressions of interest because (1) the proposed allotment of Channel 294A to Belle Meade, Tennessee is mutually exclusive with the current allotment of Channel 294A at Mt. Juliet, Tennessee; (2) the allotment of Channel 294A to Mt. Juliet is a technically defective allotment because it cannot be implemented due to predicted electromagnetic interference ("EMI") to FAA navigational radio facilities; and (3) WNPL's proposed change in allotments will result in a preferential distribution of facilities under the Commission's FM allotment priorities and policies. *See Revision of FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982), and *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989). In support of its request, WNPL respectfully submits the following:

¹ An application was filed (simultaneously with the Petition for Rulemaking) to change the site and facilities of WNPL to correspond to the change in allotment and city of license proposed in the Petition for Rulemaking (BMPH-9702211D).

5. In the NPRM, the Commission notes that the normal comparison of an existing allotment to a proposed allotment to determine whether a preferential arrangement of allotments will result may be inapplicable in this case if it can be demonstrated that the existing Channel 294A allotment at Mt. Juliet cannot be implemented due to predicted EMI to air navigation and the attendant air safety concerns. Specific comment regarding this matter is requested (NPRM at ¶ 4).

6. Attached is the Engineering Statement of Roy P. Stype, III which details the extent of the EMI to the FAA's air navigation facilities. Figure 1.0 to Mr. Stype's statement depicts the area within which WNPL may be located to provide city grade coverage to all of Mt. Juliet and the limitation imposed by the spacing requirement of WSKZ, Chattanooga, Tennessee (the "Permissible Area"). Using the FAA's Airspace Analysis Model ("AAM"), Mr. Stype examined the impact upon the numerous air navigation stations serving the Nashville and Smyrna Airports of a WNPL facility located within the Permissible Area, including an operation at the lowest possible power level from a site located at the greatest possible distance from the relevant air navigation stations. The AAM study shows that there is no site from which WNPL can operate to provide the required city grade service to Mt. Juliet without causing predicted EMI to air navigation stations and jeopardizing aeronautical safety. Mr. Stype also reports that the reallocation of Channel 294A to Belle Meade, on the other hand, will permit this allotment to be activated without compromising aeronautical safety. This conclusion is based on the fact that the FAA has already preliminarily reviewed the proposal by WNPL to operate on Channel 294A at Belle Meade and has determined that the proposed facilities, with the agreed upon frequency change of two localizers, satisfy its concerns regarding EMI.

7. Attached hereto is the May 12, 1997 letter of Gerald J. Markey, Program Director for Spectrum Policy and Management, Office of Spectrum Policy and Management, Office of

Associate Administrator for Airway Facilities, Federal Aviation Administration, who reviewed Mr. Stype's Engineering Statement submitted herewith, in which Mr. Stype concludes that there is no site from which WNPL can operate to provide the required city grade service to Mt. Juliet without causing predicted EMI to air navigation facilities operated by the FAA at the Nashville International Airport and the Smyrna Airport. Mr. Markey states:

We have looked at the proposed, possible antenna sites [of Mr. Stype's report] and agree that none of these sites could operate without causing unacceptable predicted EMI within one or more of the frequency protected service volumes of the instrument landing systems at the above noted airports.

It is clear that the FAA will not issue a determination of no hazard to air navigation to a station operating on Channel 294A to serve Mt. Juliet; therefore, the allotment of that channel to Mt. Juliet is defective.

8. The Commission also requests comments upon the issue of whether the allotment to Belle Meade is entitled to a first local service preference in light of Belle Meade's location within the Nashville urbanized areas (NPRM at ¶ 5). It is important to note that, as shown on Figure 2.0 to Mr. Stype's Statement, the entire incorporated areas of both Mt. Juliet and Belle Meade lie totally within the Nashville Urbanized Area. Thus, the reallocation of Channel 294A from Mt. Juliet to Belle Meade does not represent a reallocation from a rural community to a community within an urban area, but, rather, a reallocation from one community within an urbanized area to another community within the same urbanized area. Further, WNPL will place a 1 mV/m signal over all of Mt. Juliet from the site specified in its pending application.

9. Table 2.0 to Mr. Stype's Statement is a tabulation of the area and population within the Nashville Urbanized Area which would receive both 3.16 mV/m and 1 mV/m service from the authorized and proposed operation of WNPL. The Table shows that WNPL, from its

authorized and proposed sites, provides 3.16 mV/m service to more than 50% of the Nashville Urbanized Area, with only a slight increase in service from the proposed site. Similarly, the authorized and the proposed operations of WNPL provide 1 mV/m service to in excess of 95% of the Urbanized Area, with only a slight increase in service from the proposed site. It is clear that the proposed allotment and the present allotment stand on common footing with regard to the Nashville Urbanized Area and that awarding the proposed allotment to Belle Meade with a first local service preference, in light of the impossibility of providing service from a site capable of serving Mt. Juliet, is appropriate.

10. Lastly, assuming arguendo that Belle Meade is not entitled to a preference as a first local service, 47 U.S.C. Section 307(b)'s provision for the distribution of stations on a fair, efficient, and equitable basis and in the public interest is best served by a finding that a Belle Meade allotment is preferable to a technically defective allotment at Mt. Juliet from which no service can be provided.

11. In summary, the allotment of Channel 294A to Belle Meade will result in a first local service to a community of 2,839 and a gain of service to 23,946 persons. Belle Meade has its own police department, places of worship, newspaper, city manager, and a very substantial number of businesses. Failure to reallocate the channel to Belle Meade would adversely affect the public interest by denying 368,208 persons city grade coverage and 571,720 1 mV/m service: It is not in the public interest to leave the channel fallow because of EMI to air navigation facilities.


12. WNPL had commenced testing from its Mt. Juliet site and had employed an operating staff at the time the commitment was made to discontinue operation from its present site because of EMI. Great expense has been incurred in maintaining that staff during the period the station has been required to be off the air. Expedited consideration of this petition is

requested in order to return the station to the air as soon as possible and recommence service to the public.

WHEREFORE, for the foregoing reasons, Mt. Juliet Broadcasting, Inc. respectfully requests that the Commission (1) amend Section 73.202(b) of its Rules to allot Channel 294A at Belle Meade, Tennessee and to delete Channel 294A at Mt. Juliet, Tennessee, and (2) modify WNPL's authorization to specify construction and operation thereon.

Respectfully submitted,

MT. JULIET BROADCASTING, INC.

By: 
Edward W. Hummers, Jr.
Julie Chung Kim
Its Counsel

Holland & Knight LLP
2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20037-3202
(202) 457-7145

May 12, 1997
WAS-257931.2



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., S.W.

Washington, DC 20591

MAY 12 1997

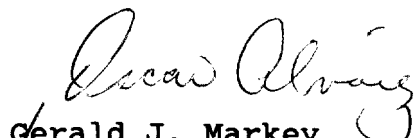
Edward W. Hummers, Jr.
Holland & Knight, LLP
2100 Pennsylvania Avenue, NW.
Suite 400
Washington, DC 20037

Dear Mr. Hummers:

We have reviewed the engineering statement dated May 7, of Roy P. Stype, III consulting engineer prepared in support of comments to be filed in Federal Communications Commission MM Docket 97-97, with regard to the issue of potential electromagnetic interference ("EMI") to air navigation facilities operated by the Federal Aviation Administration at the Nashville, Tennessee International Airport and the Smyrna, Tennessee Airport. We have looked at the proposed, possible antenna sites and agree that none of these sites could operate without causing unacceptable predicted EMI within one or more of the frequency protected service volumes of the instrument landing systems at the above noted airports.

If you have any questions, please contact Jerrold Sandors, Spectrum Assignment and Engineering Division, at (202) 267-9720.

Sincerely,


Gerald J. Markey
Program Director for
Spectrum Policy and
Management

ENGINEERING STATEMENT IN
SUPPORT OF COMMENTS

MM DOCKET 97-97

CHANNEL 294A - BELLE MEADE, TN

Mount Juliet Broadcasting, Inc.
Mount Juliet, TN

May 7, 1997

Prepared for: Mr. Michael Grant
Mount Juliet Broadcasting, Inc.
50 Music Square West
Suite 901
Nashville, TN 37203

CARL E. SMITH CONSULTING ENGINEERS

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Table 2.0 - Present and Proposed WNPL
Coverage of Nashville, TN
Urbanized Area

Appendix A - EMI Calculations For
Facilities Authorized By
WNPL Construction Permit

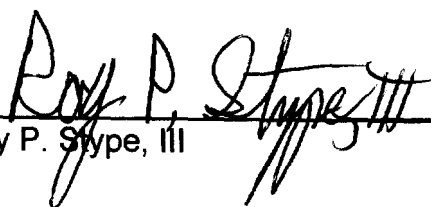
Appendix B - EMI Calculations To MQY
and PNO From Assumed Site
With 2.5 Kilowatts Effective
Radiated Power

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

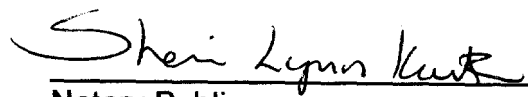
Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Mount Juliet Broadcasting, Inc., to prepare the attached "Engineering Statement In Support Of Comments - MM Docket 97-97 - Channel 294A - Belle Meade, TN."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **May 7, 1997.**



Notary Public

SHERI LYNN KURTZ, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires June 14, 2000

/SEAL/

ENGINEERING STATEMENT

Introduction

This engineering statement is prepared on behalf of Mount Juliet Broadcasting, Inc., permittee of construction permit BPH-891012MS for new FM station WNPL - Mount Juliet, Tennessee, and proponent of MM Docket 97-97, which proposes to reallocate Channel 294A from Mount Juliet, Tennessee, to Belle Meade, Tennessee, and modify the WNPL construction permit to specify Belle Meade as its community of license. It is prepared in support of comments in the above rulemaking proceeding.

The facilities authorized in the WNPL construction permit were constructed in the fall of 1996 and equipment tests were conducted for several days pursuant to the provisions of Section 73.1610 of the FCC Rules. While awaiting authority from the FCC to commence program tests, as a result of a condition on the WNPL construction permit requiring that documentation be submitted demonstrating that the WNPL operating facilities complied with FCC rules and policies regarding human exposure to nonionizing radiation, the permittee was contacted by local FAA officials, who indicated that there were concerns that the operation of WNPL with the facilities authorized by this construction permit was causing electromagnetic interference ("EMI") to ILS receivers in aircraft utilizing several Instrument Landing System ("ILS") localizers in the Nashville area. Subsequent discussions between representatives of WNPL, the staff of the FCC's Mass Media Bureau, and the headquarters staff of the FAA's Spectrum Management Division resulted in WNPL ceasing any operation with the facilities authorized by this construction permit in light of these concerns regarding aeronautical safety.

The proposal in this rulemaking proceeding to reallocate Channel 294A from Mount Juliet to Belle Meade is the result of extensive studies and coordination with the FAA which determined that the proposed reallocation is the only possible way in which Channel 294A can be utilized anywhere in the Mount Juliet area while satisfying the FAA's concerns regarding EMI and also complying with the FCC's allocation rules regarding protection to other facilities and providing the required city grade coverage to the station's community of license. This engineering statement provides additional information, as requested in the Notice of Proposed Rulemaking in this proceeding, regarding the inability to utilize this allotment from any location which will provide the required city grade coverage to Mount Juliet and also addresses issues raised in this Notice regarding the authorized and proposed WNPL coverage of the Nashville Urbanized area.

Electromagnetic Interference From Authorized Operation Of WNPL

Studies were first conducted to evaluate the extent of the predicted electromagnetic interference to all Nashville area localizers from the facilities authorized by the WNPL construction permit. These studies were conducted utilizing the most recent version of the FAA's Airspace Analysis Model ("AAM") computer program and horizontal and vertical radiation pattern data on all critical stations, based on information extracted from the FCC files for each station. For WNPL, these studies assumed the use of the four bay half wave spaced antenna which had been installed in the process of attempting to implement the facilities authorized by this construction permit. These studies found that the authorized WNPL facilities were predicted to cause extensive EMI to four Nashville area localizers within their protected service volumes:

MQY	108.3 MHz	Runway 32	Smyrna
SSX	109.35 MHz	Runway 20L	Nashville International
PNO	109.7 MHz	Runway 31	Nashville International
VIY	111.3 MHz	Runway 20R	Nashville International

This EMI results from receiver induced intermodulation in the ILS receivers aboard aircraft utilizing the instrument approaches associated with these localizers and is due to the mixing of the WNPL signal with that of other nearby stations in the front ends of these receivers. Appendix A of this engineering statement contains the complete results of this analysis for these four localizers for the facilities authorized by the WNPL construction permit. As shown by this data, the facilities authorized by the WNPL construction permit, in combination with other Nashville area stations, are predicted to cause extensive EMI to each of these four localizers.

No Suitable Site Is Available For Channel 294A In Mount Juliet

Further studies were then conducted to evaluate the available options to eliminate this EMI while providing the required city grade coverage to Mount Juliet and also meeting the protection requirements to other stations requiring protection consideration. Figure 1.0 is a map exhibit depicting the site authorized by the WNPL construction permit in relation to the protected service volumes for these four localizers. As shown in this figure, the authorized WNPL site lies beneath the service volumes for SSX and VIY. Thus, in order to have any hope of eliminating the EMI to these two localizers, it will be necessary to relocate the WNPL site to a location which is not beneath these service volumes and at a great enough distance from these service volumes to eliminate any such EMI.

Figure 1.0 also shows the area in which the WNPL site may be located to provide city grade coverage to all of Mount Juliet, as required by Section 73.315(a) of the FCC

Rules. Also shown in this figure is a dashed boundary, labeled "164.5 km-WSKZ", which represents the full required spacing to WSKZ - Chattanooga, Tennessee, which operates on Channel 293C. Locations within this site area to the northwest of this dashed boundary would be fully spaced, while locations to the southeast of this dashed boundary would be short spaced to WSKZ and could only be utilized pursuant to the provisions of Section 73.215 of the FCC Rules. It should be noted that the site authorized by the WNPL construction permit falls slightly outside this site area, and, as a result, fails to provide the required city grade coverage to 100% of Mount Juliet.

Further studies were then conducted using the AAM program to define the western boundary of the area into which the WNPL site would have to be relocated to eliminate the predicted EMI to the service volumes for SSX and VIY. These studies assumed nondirectional operation by WNPL with a two bay antenna and an effective radiated power of 2.5 kilowatts at 157 meters above average terrain, representing operation with 6 kilowatt equivalent facilities and a tower standing approximately 500 feet above ground. An examination of aeronautical charts of this area determined that there are no existing towers approaching this height within this site area. Furthermore, constructing a new tower exceeding this height in this site area would be impractical due to FAA and other restrictions. Thus, the facilities assumed in these further studies represent a reasonable assumption regarding the lowest value of effective radiated power which could be employed by WNPL from a site in this area while still operating with facilities equivalent to the maximum permitted for a Class A station.

Based upon the results of these further studies, Figure 1.0 also depicts the western boundary of the area in which the WNPL transmitter site would have to be located to eliminate the predicted EMI to the service volumes for both SSX and VIY

based upon the assumed operating facilities outlined above. As shown in this figure, the entire fully spaced site area for WNPL in Mount Juliet falls within the area where EMI would occur to at least one of these localizers with these assumed operating facilities. Only a small portion of this site area, which would be short spaced to WSKZ and, thus, only available for use under the provisions of Section 73.215 of the FCC Rules, lies outside the area in which EMI would occur to at least one of these two localizers.

Further studies were then conducted to evaluate the predicted EMI to the other two localizers (MQY and PNO) which receive EMI from the authorized operation of WNPL. These studies utilized the same assumed operating facilities outlined above (2.5 kW ERP/157 m AAT) from a site located in the northernmost extreme of the portion of this site area which will not cause EMI to SSX and VIY:

NL - 36° 17' 30"
WL - 86° 26' 50"

Appendix B of this exhibit contains the results of these further studies for MQY and PNO for these assumed facilities. As shown by this data, even operation with these facilities will result in significant EMI to MQY and, to a lesser extent, will also result in EMI to PNO. Since these further studies were based upon a site located at the greatest possible distance from these two localizers which will provide the required city grade service to Mount Juliet and also not cause EMI to VIY or SSX and employed the lowest practical power level possible, it is obvious that there is no site location from which WNPL can operate while eliminating this EMI which will also provide the required city grade service to Mount Juliet.

Based upon the above information, it is obvious that there is no site from which this allotment to Mount Juliet can be activated without resulting in EMI to air navigation facilities and jeopardizing aeronautical safety. Reallotting Channel 294A to Belle Meade, on the other hand, will permit this allotment to be activated without compromising aeronautical safety, since the FAA has already preliminarily reviewed the proposal by WNPL to operate on Channel 294A in Belle Meade and determined that the proposed facilities satisfy their concerns regarding EMI.

Coverage Of Nashville Urbanized Area

Figure 2.0 is a map exhibit depicting the boundaries of the Nashville Urbanized Area, as well as the city limits of both Mount Juliet and Belle Meade. As shown in this figure, the entire incorporated area of both Mount Juliet and Belle Meade lie totally within the Nashville Urbanized Area. Thus, the proposed reallotment of this channel from Mount Juliet to Belle Meade does not represent a reallotment from a rural community to an urban area, but instead represents a reallotment from one community within an urbanized area to another community within the same urbanized area.

Also shown in this figure are the predicted 3.16 mV/m (city grade) and 1 mV/m (primary service) contours for both the authorized and proposed operation of WNPL. The contours for the authorized operation of WNPL assume 6 kilowatt nondirectional operation at 100 meters above average terrain from the site authorized by the WNPL construction permit and assume uniform terrain in all directions. Those for the proposed operation assume 6 kilowatt nondirectional operation at 100 meters above average terrain from the proposed reference coordinates for Channel 294A in Belle Meade and also assume uniform terrain in all directions. Table 2.0 is a tabulation of the area and population within the Nashville Urbanized Area which would receive both 3.16

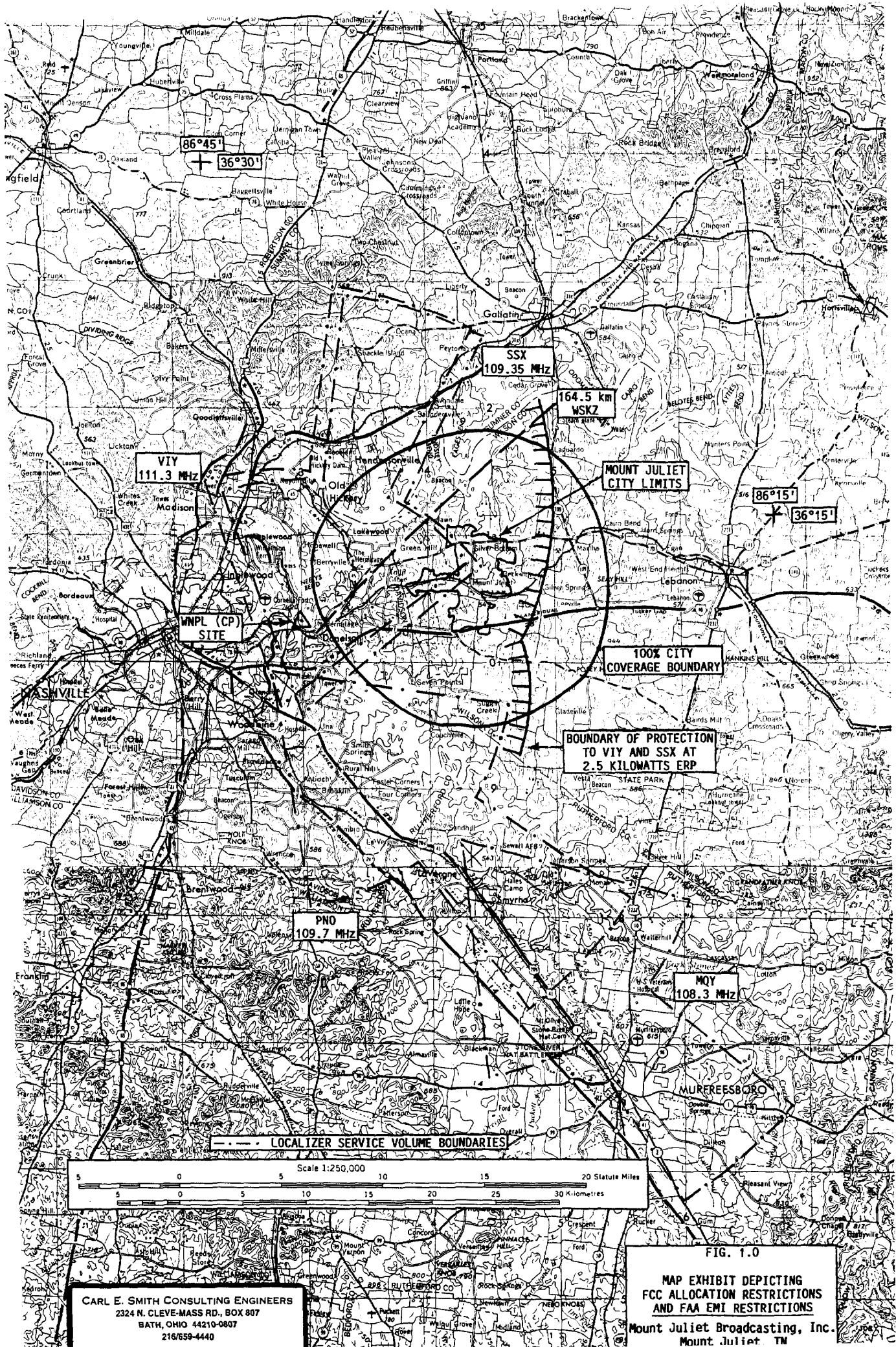
mV/m and 1 mV/m service from the authorized and proposed operation of WNPL. As shown by this data, the authorized operation of WNPL provides 3.16 mV/m service to greater than 50% of this urbanized area and the extent of this 3.16 mV/m service to this urbanized area would only increase marginally for the proposed facilities. Furthermore, the authorized operation of WNPL provides 1 mV/m service to in excess of 95% of this urbanized area and the extent of this 1 mV/m service would only increase marginally for the proposed facilities.

It should also be noted that the reallocation of Channel 294A to Belle Meade will not totally eliminate service from WNPL to Mount Juliet. As shown in Figure 2.0, WNPL will continue to provide 1 mV/m service to all of Mount Juliet if this channel is reallocated to Belle Meade.

Summary

The information outlined above clearly establishes that there is no area in which the transmitter site for Channel 294A in Mount Juliet can be located in order to satisfy FAA concerns regarding electromagnetic interference to air navigation facilities while also providing the required city grade coverage to Mount Juliet. On the other hand, however, preliminary FAA approval has already been obtained for proposed facilities to serve Belle Meade on this channel. Thus, while this data proves that Channel 294A in Mount Juliet cannot be activated, it is apparent that it will be possible to activate this channel if it is reallocated to Belle Meade, as proposed. Accordingly, when given the choice between allowing this channel to lie fallow or reallocating it to another community in which it can be activated, it is obvious that the reallocation of this channel to Belle Meade best serves the public interest.

The above data also clearly shows that the proposed reallocation will not result in this channel being moved from a rural area to an urbanized area, as the authorized operation of WNPL already provides substantial service to the Nashville Urbanized area and the entire city of Mount Juliet lies within this urbanized area. Thus, the proposed reallocation will simply result in this channel being moved from one city to another within the same urbanized area in order to permit a station occupying this allotment to be activated.



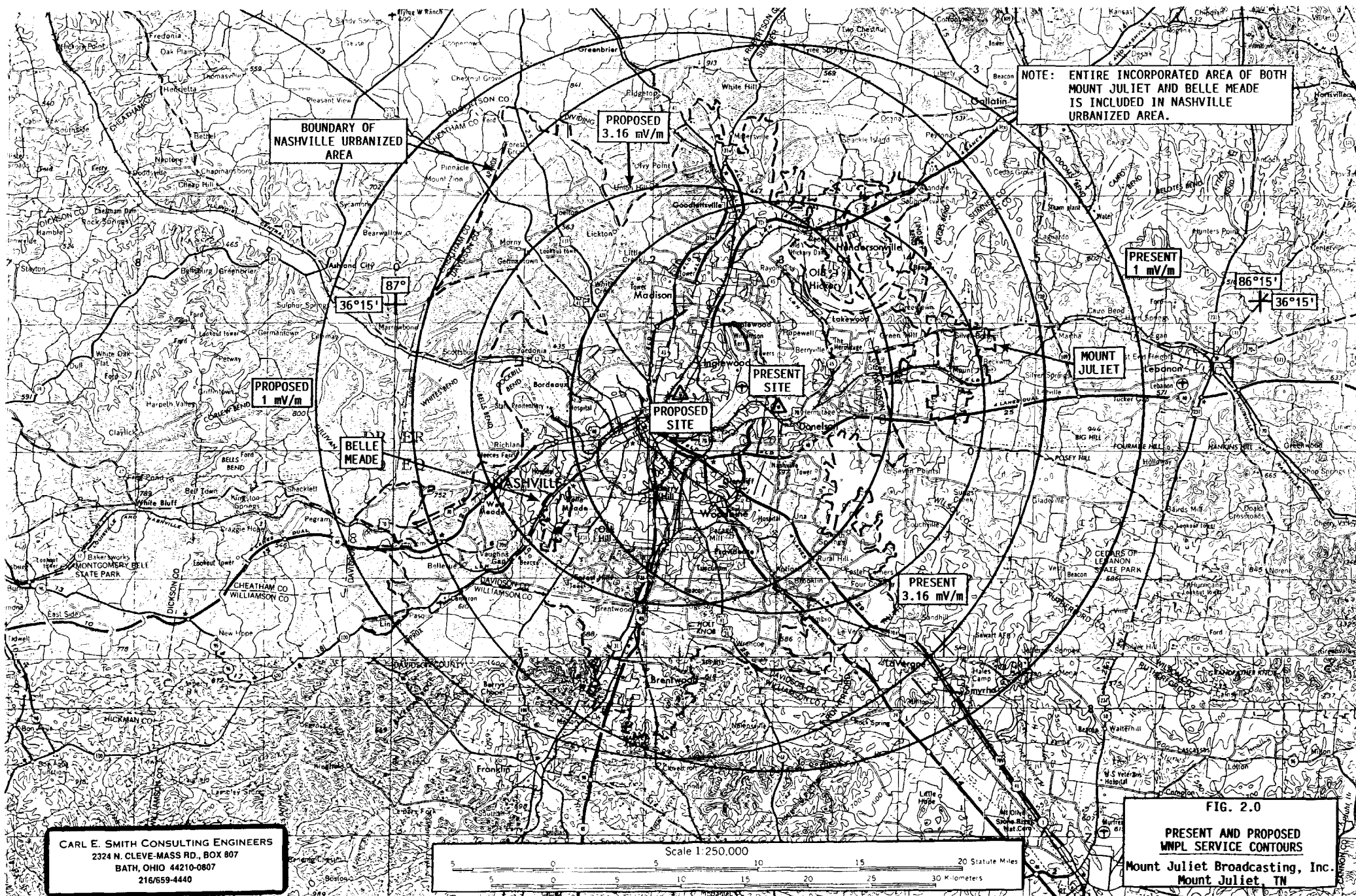


TABLE 2.0

PRESENT AND PROPOSED WNPL
COVERAGE OF NASHVILLE, TN URBANIZED AREA

Mount Juliet Broadcasting, Inc.
 Mount Juliet, TN

	<u>Area</u>		<u>Population</u> <u>(1990 U. S. Census)</u>	
	<u>(square km)</u>	<u>(Percent)</u>	<u>(Persons)</u>	<u>(Percent)</u>
	<u>3.16 mV/m</u>			
Present	686.4	54.8	325,915	56.9
Proposed	758.5	60.6	368,208	64.2
	<u>1 mV/m</u>			
Present	1196.2	95.5	545,948	95.2
Proposed	1249.0	99.7	571,720	99.7

Total area of Nashville, TN, urbanized area = 1252.2 square km.

Total population of Nashville, TN, urbanized area = 573, 294.

APPENDIX A
EMI CALCULATIONS FOR
FACILITIES AUTHORIZED BY
WNPL CONSTRUCTION PERMIT

Airspace case #: WNPL

Site: CONSTRUCTION PERMIT SITE

Date: 5/7/97

Navaid Identifier: MQY

Navaid Frequency (MHz): 108.30

Navaid Latitude: 36. 1 12

Navaid Longitude: 86. 31 52

Runway Heading (True): 319.0

Runway Elevation (Ft. MSL): 535.

Runway Length (Ft): 8037.

Prop Stat	ID Call	Freq (MHz)	Latitude	Longitude	ERP (Kw)	Height (MSL)	Range (NM)	Radial (True)	Lic Stat
1	WFSK	88.10	36. 10 0	86. 48 17	.700	551.	15.92	123.56	L
2	NEWx	88.30	35. 28 54	86. 27 28	.250	866.	32.50	353.69	
3	NEWx	88.30	35. 50 56	86. 21 11	.200	768.	13.42	319.88	A
4	NEW-	88.50	35. 20 30	86. 11 5	.038	1184.	44.06	337.47	A
5	WVCP	88.50	36. 28 2	86. 28 35	1.000	1096.	26.96	185.64	L
6	WAYM	88.70	35. 49 27	86. 49 28	3.700	1309.	18.47	50.50	L
7	WAYM	88.70	35. 49 27	86. 49 28	16.500	1309.	18.47	50.50	A
8	WNAZ	89.10	36. 8 33	86. 45 10	1.400	666.	13.02	124.36	L
9	WNAZ	89.10	36. 8 28	86. 45 23	1.400	738.	13.12	123.63	
10	WMOT	89.50	35. 51 0	86. 21 0	50.000	846.	13.47	319.22	L
11	WMOT	89.50	36. 5 7	86. 26 22	100.000	1260.	5.93	228.63	C
12	WPLN	90.30	36. 2 8	86. 50 56	80.000	1903.	15.45	93.46	L
13	WRVU	91.10	36. 8 27	86. 51 56	14.500	1037.	17.76	114.09	L
14	W217	91.30	35. 28 54	86. 27 28	.080	876.	32.50	353.69	C
15	WCPI	91.30	35. 40 44	85. 46 1	1.000	1014.	42.43	298.84	A
16	WFMQ	91.50	36. 12 13	86. 18 1	.500	656.	15.70	225.45	L
17	WFCM	91.70	35. 43 52	86. 41 25	1.000	1677.	18.98	24.06	A
18	NEW-	91.90	35. 50 56	86. 21 11	.080	722.	13.42	319.88	
19	WQQK	92.10	36. 17 50	86. 45 11	3.000	1053.	19.81	147.12	L
20	WJXA	92.90	36. 7 14	86. 58 7	100.000	1663.	22.06	105.87	L
21	W230	93.90	36. 28 2	86. 28 30	.100	1076.	26.97	185.78	C
22	WRLG	94.10	35. 59 43	86. 33 29	3.900	823.	1.98	41.39	C
23	NEW-	94.10	36. 9 46	86. 46 34	.250	551.	14.65	125.80	A
24	WJJM	94.30	35. 27 3	86. 46 57	3.000	919.	36.28	19.72	L
25	W233	94.50	36. 17 47	86. 35 3	.027	732.	16.78	171.19	A
26	NEW-	94.50	36. 5 22	86. 42 13	.250	699.	9.35	116.47	
27	W234	94.70	36. 7 29	86. 50 49	.100	607.	16.56	112.30	L
28	W234	94.70	36. 8 27	86. 51 56	.200	1010.	17.76	114.09	A
29	WSMx	95.50	36. 8 27	86. 51 56	100.000	1864.	17.76	114.09	L
30	WRMX	96.30	36. 5 7	86. 26 22	100.000	1407.	5.93	228.63	L
31	WRMX	96.30	36. 15 50	86. 47 38	52.000	1886.	19.40	138.97	C
32	NEWx	97.10	36. 20 45	86. 31 54	50.000	1043.	19.55	179.92	A
33	NEWx	97.10	36. 12 58	86. 33 32	50.000	1004.	11.84	173.47	A
34	NEWx	97.10	36. 14 4	86. 31 31	50.000	1017.	12.87	181.26	A
35	NEWx	97.10	36. 16 5	86. 47 16	9.700	1719.	19.40	140.12	A

36	NEWx	97.10	36.	16	31	86.	53	7	50.000	1093.	23.00	131.75	A	
37	NEWx	97.10	36.	16	57	86.	48	6	50.000	1099.	20.49	140.23	A	
38	NEWx	97.10	36.	17	22	86.	33	1	50.000	1014.	16.19	176.71	A	
39	NEWx	97.10	36.	18	18	86.	46	14	24.500	1299.	20.66	145.85	A	
40	NEWx	97.10	36.	18	18	86.	46	42	24.500	1299.	20.88	145.00	A	
41	WSIX	97.90	36.	2	49	86.	49	49	100.000	1804.	14.61	96.35	L	
42	NEW-	98.70	35.	52	3	86.	24	14	.075	692.	11.04	325.97		
43	NEW-	98.70	36.	8	27	86.	51	56	.010	1010.	17.76	114.09		
44	W254	98.70	36.	9	49	86.	46	45	.010	1066.	14.79	125.62	A	
45	W254	98.70	36.	2	50	86.	49	48	.010	1171.	14.59	96.43		
46	WANT	98.90	36.	12	24	86.	16	2	5.000	942.	17.00	228.79	C	
47	NEW-	98.90	35.	54	44	86.	51	59	.080	696.	17.52	68.34		
48	W257	99.30	36.	10	28	86.	40	9	.003	804.	11.43	144.16	C	
49	WWTN	99.70	35.	49	3	86.	31	24	100.000	1982.	12.16	358.22	C	
50	WRLT	100.10	36.	9	49	86.	46	45	.600	909.	14.79	125.62		
51	WRLT	100.10	35.	55	20	86.	42	46	5.400	1450.	10.59	56.37		
52	WRLT	100.10	36.	2	6	86.	50	54	.200	1946.	15.42	93.35	A	
53	W263	100.50	35.	50	26	86.	23	27	.027	843.	12.74	327.67		
54	W263	100.50	35.	26	29	86.	49	27	.013	1089.	37.54	22.35	C	
55	W263	100.50	35.	23	14	86.	47	14	.010	1355.	39.96	18.19		
56	W264	100.70	35.	37	5	87.	2	40	.027	935.	34.72	46.00	C	
57	WFTZ	101.50	35.	23	51	86.	8	39	3.000	1342.	41.84	333.22	L	
58	WKOM	101.70	35.	37	4	87.	2	34	3.000	997.	34.67	45.89	L	
59	WJLE	101.70	35.	55	31	85.	49	14	3.000	1145.	34.97	279.35	L	
60	W270	101.90	36.	13	57	86.	16	0	.010	653.	18.08	225.15	C	
61	W270	101.90	35.	50	26	86.	23	27	.055	755.	12.74	327.67		
62	W271	102.10	36.	7	29	86.	50	49	.100	607.	16.56	112.30	L	
63	W271	102.10	36.	8	27	86.	51	56	.030	1010.	17.76	114.09	A	
64	WZPC	102.90	35.	48	1	86.	37	17	100.000	1598.	13.89	18.41	C	
65	WZPC	102.90	35.	48	1	86.	37	17	100.000	1588.	13.89	18.41	L	
66	WKDF	103.30	36.	2	8	86.	50	56	100.000	2005.	15.45	93.46	L	
67	WTRZ	103.90	35.	40	0	85.	46	0	5.300	1201.	42.80	299.69	L	
68	WUCZ	104.10	36.	18	43	85.	57	8	4.900	1115.	33.06	238.01	L	
69	WGFX	104.50	36.	16	5	86.	47	16	49.000	1929.	19.40	140.12	L	
70	WBOZ	104.90	35.	49	33	86.	9	28	6.000	1155.	21.56	302.71		
71	WBOZ	104.90	35.	49	33	86.	9	28	3.000	1155.	21.56	302.71	C	
72	WLAC	105.90	36.	2	8	86.	50	56	100.000	2005.	15.45	93.46	L	
*	73	WNPL	106.70	36.	10	30	86.	40	8	6.000	833.	11.45	144.31	A
	74	WRVW	107.50	36.	15	50	86.	47	38	58.000	1837.	19.40	138.97	L
	75	W299	107.70	35.	41	42	85.	46	33	.200	1135.	41.58	297.97	C

The following stations use a directional antenna:

ID	Call	Rotation	File	Description
69	WGFX	.0	FMHOR01.PAT	WGFX